

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:20-CV-00197-D

ANNA BEAVON GRAVELY,

Plaintiff,

v.

AMERICANS FOR PROSPERITY,

Defendant.

JOINT MOTION FOR ENTRY OF
CONSENT PROTECTIVE ORDER
FED R. CIV. P. 26(C)

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff Anna Beavon Gravely (“Plaintiff”) and Defendant Americans for Prosperity (“Defendant”) (each a “Party” and collectively, the “Parties”) jointly move for the entry of a Consent Protective Order. The Parties assert that a protective order is necessary to protect the confidential and proprietary information of the Parties, including the private employment information of Plaintiff and Defendants’ employees. In the interest of furthering discovery, and for the mutual protection of the Parties, the Parties respectfully request that the Court enter the Consent Protective Order, attached as Exhibit 1.

Respectfully submitted this 23rd day of April, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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This the 23rd day of April, 2021.

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